

This Track 1 Decision Document is marked "Draft" but is a final document signed by the agencies.

NAAM date 5/23/2002

**DOE/ID-10922**  
**July 2001**

**RECEIVED**

**SEP 04 2001**

**DEPT. OF ENVIRONMENTAL QUALITY**  
**TECHNICAL SERVICES OFFICE**

**Site 024 Track 1 Decision Documentation**  
**Package, OU 10-08**

**DECISION DOCUMENTATION PACKAGE  
COVER SHEET**

Prepared in accordance with

**TRACK 1 SITES:  
GUIDANCE FOR ASSESSING  
LOW PROBABILITY HAZARD SITES  
AT THE INEEL**

**Site Description: Homestead Site Northwest of Specific Manufacturing Capability  
(SMC)/Test Area North (TAN)**

**Site ID: 024**

**Operable Unit: 10-08**

**Waste Area Group: 10**

**I. SUMMARY – Physical description of the site:**

Site 024 is a former homestead site located within the INEEL boundary between Highway 22 and the Birch Creek drainage gravel pit, approximately 6 miles northwest of the Specific Manufacturing Capability (SMC)/Test Area North (TAN) facility. The site was originally listed as part of an environmental baseline assessment in 1994 and identified as a potential new waste site in 1995. In accordance with Management Control Procedure-3448, *Reporting or Disturbance of Suspected Inactive Waste Sites*, a new site identification form was completed for the site. As part of the process, a field team wrote a site description, and collected photographs and global positioning system (GPS) coordinates of the site (the GPS coordinates are E341454.11 by N822235.76). The GPS coordinate system is listed as North American Datum 27, Idaho East Zone, State Plane Coordinates. The new site identification process also included a search and review of existing historical documentation.

Investigations revealed that Site 024 is an abandoned homestead, considered by the Idaho State Historic Preservation Office (SHPO) to be a significant historical/archaeological resource. The site includes the remains of a lava rock foundation; empty rusted cans, wood stoves, weathered wood, wire, broken glass and equipment parts. The artifacts are scattered over an area approximately 150 ft by 150 ft. INEEL Cultural Resources confirmed that based on the weathered, vintage condition of the debris it was abandoned in place more than fifty years ago, and predates INEEL operations.

There is no visual evidence of hazardous constituents, nor evidence that waste has recently been disposed of at this site. There is no evidence of disturbed vegetation, stained or discolored soil or odors. The ground surface shows well-established native grasses and sagebrush.

**DECISION RECOMMENDATION****II. SUMMARY - Qualitative Assessment of Risk:**

There is no evidence that a source of contamination exists at this site, nor is there empirical, circumstantial or other evidence of contaminant migration. The reliability of information provided in this report is high. Field investigations, interviews with Cultural Resource personnel, and photographs revealed no visual evidence of hazardous substances that may present a danger to human health or the environment. Therefore, the overall qualitative risk at Site 024 is considered low.

**III. SUMMARY - Consequences of Error:****False negative error:**

The possibility of contaminant levels at this site being above risk-based limits is remote. Field surveys and visual observations of the debris and surface soil indicated no evidence of hazardous constituents. If hazardous materials and wastes were placed into this area, evidence such as stained soil, odors, loss of vegetation, fibrous materials, or other indications of contamination would have been noted during site visits.

**False positive error:**

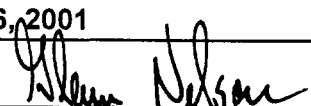
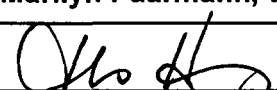
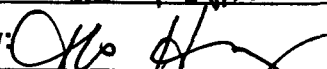
If further action were completed at this low risk site, funds could exceed the environmental benefit. Surface soil sampling and analysis for organic compounds, metals, radionuclides or other hazardous constituents would be needed to confirm the presence or absence of contamination. Based on existing information, there is no need for further action at this site.

**IV. SUMMARY - Other Decision Drivers:**

INEEL Cultural Resource personnel determined that this site meets the requirements as a cultural or historic resource. Prior to completing any further field investigations, an intensive pedestrian inventory would need to be conducted. This survey would be required to identify and evaluate cultural properties within the area of potential effects for cleanup activities; conduct a preliminary assessment of the potential impact of cleanup on any identified properties; and develop preliminary avoidance strategies or data recovery plans if necessary to avoid any adverse affects.

**Recommended Action:**

It is recommended that this newly identified site be classified as No Further Action. Field investigations, interviews, historical knowledge of this area, and photographs indicate it is highly unlikely that hazardous or radioactive materials were generated or disposed of at this site. It is located in a remote, abandoned area with no viable pathways or receptors. Test Area North (TAN) is the closest facility located approximately 6 miles southeast of the site. There is nothing present at this site that would indicate evidence of contaminant migration, or historical or threatened release of hazardous substances, pollutants or contaminants. This site is similar to several other historical sites across the INEEL that were either homesteads or stage crossings containing domestic or agricultural waste that does not pose a potential risk to human health or the environment.

<b>Signatures:</b>	<b># Pages: 16</b>	<b>Date: July 16, 2001</b>
<b>Prepared By: Marilyn Paarmann, WPI</b>	<b>DOE WAG Manager:</b> 	
<b>Approved By:</b> 	<b>Independent Review:</b> 	

**DECISION STATEMENT  
(DOE RPM)**

Date Received: 3/18/02

**Disposition:**

Site 024 is an old homestead. No evidence of industrial chemical contamination was found. No remedial action is required.

Date: 4/02/02

# Pages: 1

Name: Kathleen Hain

Signature: Kathleen S Hain

DECISION STATEMENT  
(EPA RPM)

Date Received:

9/4/01

16-08-024

Disposition:

Site appears to be an abandoned homestead.  
Location & photographic evidence does not  
suggest industrial activity. No further  
investigation appears necessary.

Date:

10/24/01

# Pages:

1

Name:

Wayne Pierre

Signature:

Wayne Pierre

DECISION STATEMENT  
(IDEQ RPM)

Date Received: September 4, 2001

Disposition:

Site #024

Site #024 is a former homestead site located about 6 miles northwest of the SMC/TAN facility. Debris at the site includes empty rusted cans, wood stove, wood, wire, and broken glass. There is no evidence that hazardous constituents or waste have been disposed at the site nor is there evidence of disturbed vegetation or discolored soil. The state concurs this is a **no further action** site.

Date: 2/6/02

# Pages:

Name: Dean J. Nygard

Signature: 

<b>PROCESS/WASTE WORKSHEET</b> <b>SITE ID: 024</b> <b>PROCESS: Homestead Site Northwest of SMC</b> <b>WASTE: Homestead/Domestic Debris</b>		
Col 1 Processes Associated With This Site	Col 2 Waste Description & Handling Procedures	Col 3 Description & Location of any Artifacts/Structures/Disposal Areas Associated with this Waste or Process
Debris pile containing materials discarded from an early twentieth century homestead site.	Homestead/domestic waste pile likely abandoned by former residents.	<p><b>Artifact:</b> Domestic Debris</p> <p><b>Location:</b> The site is located between Highway 22 and the Birch Creek drainage gravel pit, 9 miles from the Highway 22/Highway 33 intersection, and approximately 6 miles northwest of TAN.</p> <p><b>Description:</b> Surface debris includes remnants of a lava rock foundation, empty rusted cans, wood stoves, weathered wood, wire, broken glass and equipment parts. The debris is scattered over a 150 ft x 150 ft area. The artifacts are more than 50 years old and predate INEEL activities.</p>



<b>CONTAMINANT WORKSHEET</b>								
<b>SITE ID: 024</b>								
<b>PROCESS: <u>Homestead Site Northwest of SMC</u></b>					<b>WASTE: <u>Homestead Debris</u></b>			
<b>Col 4</b> What Known/Potential Hazardous Substance/Constituents are Associated with this Waste or Process?	<b>Col 5</b> Potential Sources Associated with this Hazardous Material	<b>Col 6</b> Known/Estimated Concentration of Hazardous Substances/ Constituents	<b>Col 7</b> Risk-based Concentration	<b>Col 8</b> Qualitative Risk Assessment (hi/med/low)	<b>Col 9</b> Overall Reliability (high/med/low)			
None	Soil	None	Not Applicable	Low	High			

**Question 1. What are the waste generation processes, locations, and dates of operation associated with this site?**

**Block 1 Answer:**

Site 024 is recorded as an old pioneer homestead containing remnants of a lava rock foundation, empty rusted cans, wood stoves, weathered wood, wire, broken glass and equipment parts. INEEL Cultural Resource personnel determined that the site is more than fifty years old, and that the artifacts found at the site are domestic in nature, and predate INEEL operations. The site is located between Highway 22 and the Birch Creek drainage gravel pit; 9 miles from the Highway 22/Highway 33 intersection. The site is in the northern section of the INEEL in close proximity to the Birch Creek Playas. Test Area North (TAN) is the closest facility located approximately 6 miles southeast of the site. The surface debris encompasses an area of approximately 150 ft by 150 ft.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Interviews with INEEL Cultural Resources and Environmental Restoration Environmental Safety and Health (ER ES&H) personnel revealed that the site is a historic homestead. The artifacts found at the site are domestic in nature and pose no hazard to the site.

**Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

Interviews were conducted by ER ES&H personnel during a 1994 environmental assessment. Interviews conducted with INEEL Cultural Resource personnel confirm that the site was an early twentieth century homestead and that the artifacts found there predate INEEL activities. Photographs confirm the types of debris present at the site.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
Photographs	<input checked="" type="checkbox"/> 3	Safety analysis report	<input type="checkbox"/>
Engineering/site drawings	<input type="checkbox"/>	D&D report	<input type="checkbox"/>
Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 4
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 2. What are the disposal processes, locations, and dates of operation associated with this site? How was the waste disposed?**

**Block 1 Answer:**

Interviews with INEEL Cultural Resource personnel revealed that Site 024 is a historic resource. The site is located within the boundaries of the INEEL, between Highway 22 and the Birch Creek drainage gravel pit; 9 miles from the Highway 22/Highway 33 intersection. Test Area North (TAN) is the closest facility located approximately 6 miles southeast of the site. Site investigations indicate that the debris resulted from homesteaders living on what is now INEEL property. Cultural Resources confirmed that the site is more than fifty years old and the artifacts found there predate INEEL operations.

**Block 2 How reliable are the information sources? ☒ High \_\_Med \_\_Low (check one)**  
**Explain the reasoning behind this evaluation.**

Interviews with INEEL Cultural Resource personnel revealed that this site was a historic pioneer homestead now designated as a SHPO cultural resource.

**Block 3 Has this INFORMATION been confirmed? ☒ Yes \_\_ No (check one)**  
**If so, describe the confirmation.**

Interviews were conducted with INEEL Cultural Resource personnel confirming the cultural value, history of the site, and estimated age of the artifacts. Photographs confirm the types of debris present at the site.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
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Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input type="checkbox"/>
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 3. Is there evidence that a source exists at this site? If so, list the sources and describe the evidence.**

**Block 1 Answer:**

There is no visual evidence that a source exists at Site 024. The artifacts and surrounding area do not indicate evidence of any hazardous constituents, stained or discolored soil, or visual evidence of disturbed vegetation. The debris has been identified as being domestic in nature, was most likely abandoned by early homesteaders, and predates INEEL activities.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Interviews with INEEL Cultural Resource personnel revealed that this is a former homestead site. The artifacts are domestic in nature and pose no potential threat to human health or the environment.

**Block 3 Has this information been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

Interviews held with INEEL Cultural Resource Management personnel confirmed that the SHPO consider this site to be a cultural resource. Photographs taken during the environmental baseline assessment and Cultural Resource surveys did not indicate evidence of any potential hazardous constituents.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
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Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 4. Is there empirical, circumstantial, or other evidence of migration? If so, what is it?**

**Block 1 Answer:**

There is no evidence of migration at Site 024. Site investigations reveal no visual evidence of hazardous constituents, odors, or stained or discolored soil. The vegetation appears to be well established. It has been determined by Cultural Resources that this site contains domestic debris left by early twentieth century homesteaders.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

Visual site inspections and photographs of the site show that vegetation is well established; the artifacts are old and predate INEEL activities.

**Block 3 Has this information been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

This information was confirmed through site inspections, subsequent INEEL Cultural Resource surveys and photographs.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
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Summary documents	<input checked="" type="checkbox"/> 1	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 5. Does site operating or disposal historical information allow estimation of the pattern of potential contamination? If the pattern is expected to be a scattering of hot spots, what is the expected minimum size of a significant hot spot?**

**Block 1 Answer:**

There is no expected pattern of potential contamination because there is no evidence of release of hazardous substances to the site. There is no evidence of stained or discolored soil in the area, odors or visual evidence of disturbed vegetation. Based on recorded SHPO reports provided by Cultural Resources there is no reason to suspect hazardous constituents are present at this site.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one) Explain the reasoning behind this evaluation.**

This information was obtained from an environmental baseline assessment conducted in 1994, and subsequent site investigations conducted by Cultural Resource personnel. Photographs taken during the surveys show the artifacts and present description of the site.

**Block 3 Has this information been confirmed? ☒ Yes ☐ No (check one)  
If so, describe the confirmation.**

This information was confirmed through site inspections, photographs and Cultural Resource historical research.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 4
Summary documents	<input checked="" type="checkbox"/> 1	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 6. Estimate the length, width, and depth of the contaminated region. What is the known or estimated volume of the source? If this is an estimated volume, explain carefully how the estimate was derived.**

**Block 1 Answer:**

Site investigations and photographs indicate that the site is approximately 150 ft by 150 ft. There is no evidence of a source at this site or contaminated region to estimate because there is no evidence of hazardous or radioactive materials. Artifacts are from a former homestead, domestic in nature, and predate INEEL activities.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

This information was obtained from an environmental baseline assessment conducted in 1994, and subsequent site surveys conducted by Cultural Resources. The area was recorded as a state historical site and there is no evidence that the artifacts pose a potential risk. Photographs taken during the survey show that the vegetation is well established and there is no evidence of stained or discolored soil.

**Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

This information was confirmed through site inspections, interviews, photographs and Cultural Resource historical research.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 4
Summary documents	<input checked="" type="checkbox"/> 1	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

**Question 7. What is the known or estimated quantity of hazardous substance/constituent at this source? If the quantity is an estimate, explain carefully how the estimate was derived.**

**Block 1 Answer:**

The estimated quantity of hazardous substances/constituents at this site is near zero because there is no evidence of any hazardous or radioactive constituents present at Site 024. Because the site consists of domestic debris abandoned by early homesteaders, it is highly unlikely that there are any potential hazardous substances present.

**Block 2 How reliable are the information sources? ☒ High ☐ Med ☐ Low (check one)**  
**Explain the reasoning behind this evaluation.**

This information was obtained from an environmental baseline assessment, Cultural Resource investigations, and photographs. The site assessments revealed no visual evidence of hazardous constituents.

**Block 3 Has this INFORMATION been confirmed? ☒ Yes ☐ No (check one)**  
**If so, describe the confirmation.**

This information was confirmed through site inspections, photographs and historical research.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 4
Summary documents	<input type="checkbox"/>	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		



**Question 8. Is there evidence that this hazardous substance/constituent is present at the source as it exists today? If so, describe the evidence.**

**Block 1 Answer:**

There is no evidence that a hazardous substance/constituent is present at levels that require action at Site 024. INEEL Cultural Resources personnel confirm that this is a historical homestead site dating to the early part of the twentieth century. Artifacts are domestic in nature, very old and predate INEEL activities.

**Block 2 How reliable are the information sources? X High \_ Med \_Low (check one)  
Explain the reasoning behind this evaluation.**

This evaluation is based on interviews, site visitations and photographs of the area. There is no evidence of hazardous constituents, soil staining or discoloration, odors and the vegetation present in and around the site appears to be well established.

**Block 3 Has this INFORMATION been confirmed? X Yes \_No (check one)  
If so, describe the confirmation.**

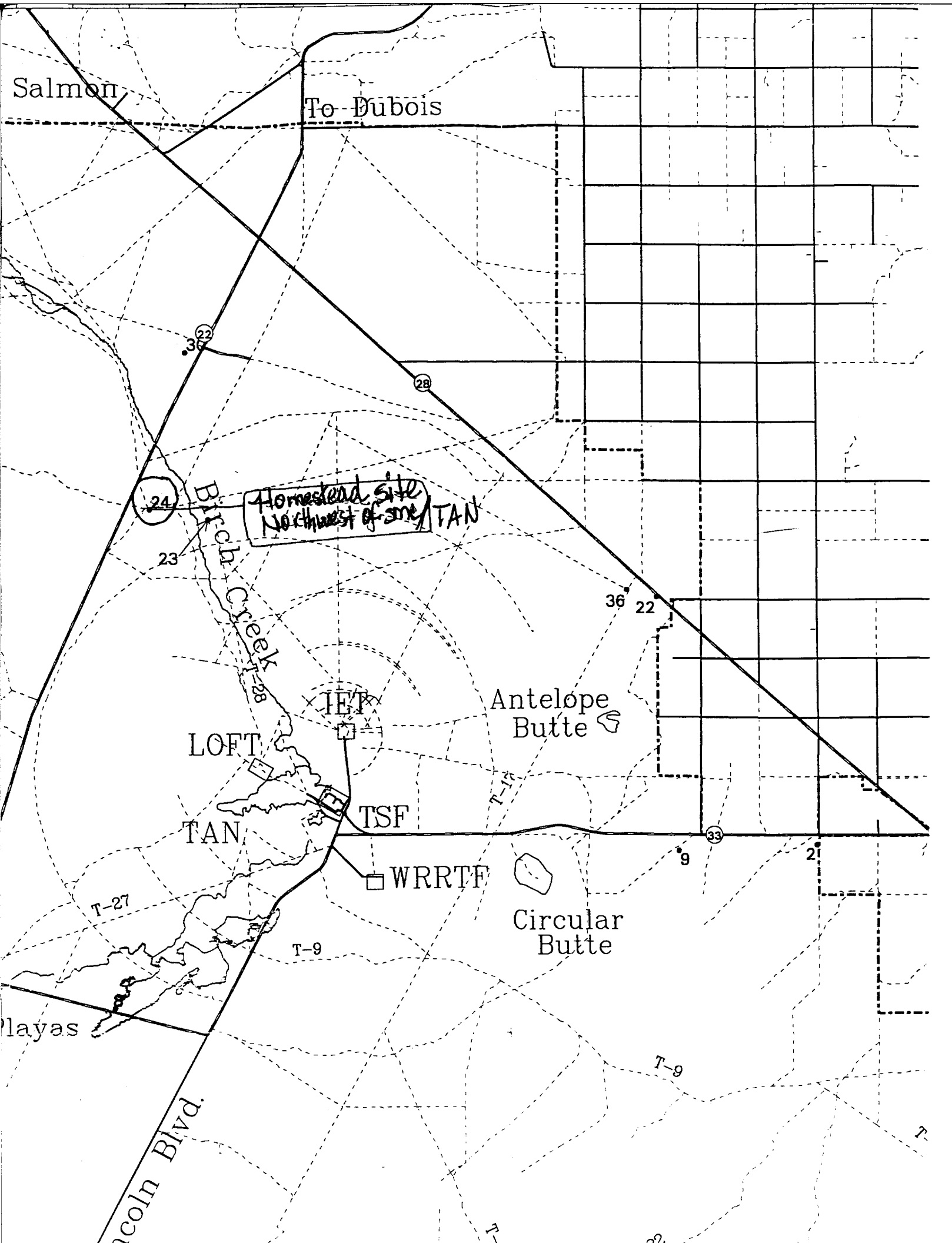
This information was confirmed through site inspections, Cultural Resource historical research, interviews and photographs.

**Block 4 Sources of Information [check appropriate box(es) & source number from reference list]**

No available information	<input type="checkbox"/>	Analytical data	<input type="checkbox"/>
Anecdotal	<input checked="" type="checkbox"/> 2, 5	Documentation about data	<input type="checkbox"/>
Historical process data	<input type="checkbox"/>	Disposal data	<input type="checkbox"/>
Current process data	<input type="checkbox"/>	Q.A. data	<input type="checkbox"/>
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Unusual Occurrence Report	<input type="checkbox"/>	Initial assessment	<input checked="" type="checkbox"/> 4
Summary documents	<input checked="" type="checkbox"/> 1	Well data	<input type="checkbox"/>
Facility SOPs	<input type="checkbox"/>	Construction data	<input type="checkbox"/>
OTHER	<input type="checkbox"/>		

## REFERENCES

1. DOE, 1992, Track 1 Sites: Guidance for Assessing Low Probability Sites at the INEL, DOE/ID-10390 (92), Revision 1, U.S. Department of Energy, Idaho Falls, Idaho, July.
2. Interviews with an Environmental Baseline Assessment team member, February 6-7, 2001.
3. Photographs of Site 001: PN99-0456-2-21, PN99-0456-2-22, PN99-0456-2-26, and PN99-0456-2-31.
4. FY 1999 WAG 10 Newly Identified Sites, Volumes I and II.
5. Interviews with Brenda Ringe Pace, INEEL Cultural Resources Management February 7 and May 16, 2001.



Salmon

To Dubois

24

22

28

23

Homestead site  
Northwest of me TAN

36

22

LOFT

IET

Antelope Butte

TAN

TSF

WRRTF

Circular Butte

T-27

T-9

T-9

Playas

Lincoln Blvd.

**Draft**

**Draft**

**Attachment A**

**Photographs of Site #024**



Site: 024, Homestead Site Northwest of SMC  
(PN99-0456-2-21)



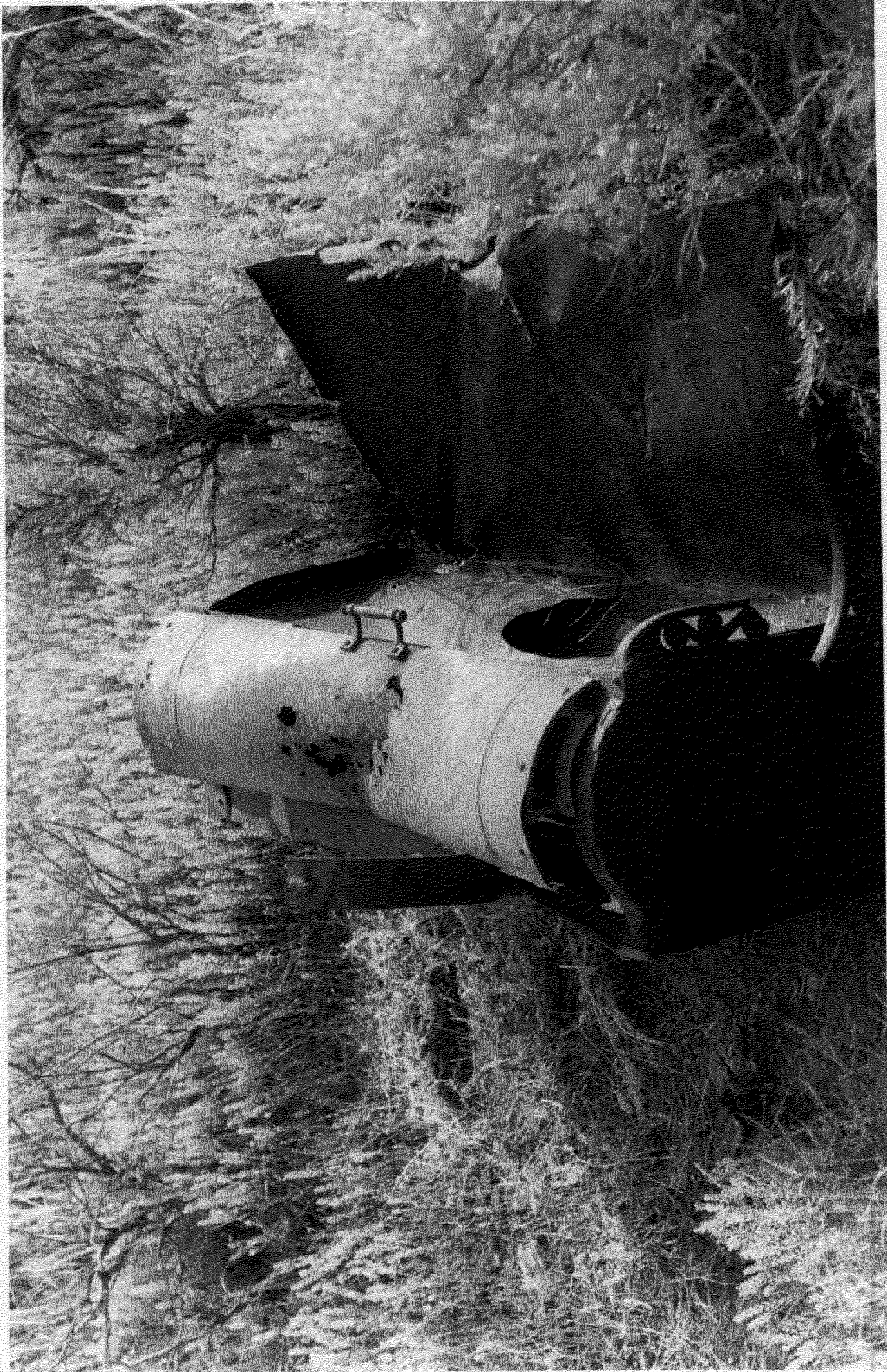


Site: 024, Homestead Site Northwest of SMC  
(PN99-0456-2-22)



Site: 024, Homestead Site Northwest of SMC  
(PN99-0456-2-26)





Site: 024, Homestead Site Northwest of SMC  
(PN99-0456-2-31)



## **Attachment B**

### **Supporting Information for Site #024**

## NEW SITE IDENTIFICATION

### Part A – To Be Completed By Observer

1. Person Initiating Report: Jacob Harris

Phone: 526-1877

Contractor WAG Manager: Douglas Burns

Phone: 526-4324

2. Site Title: 024, Homestead Site Northwest of SMC

3. Describe the conditions that indicate a possible inactive or unreported waste site. Include location and description of suspicious condition, amount or extent of condition and date observed. A location map and/or diagram identifying the site against controlled survey points or global positioning system descriptors shall be included to help with the site visit. Include any known common names or location descriptors for the waste site.

The old homestead is located between Highway 22 and the Birch Creek drainage gravel pit; 9 miles from the highway 22/highway 22 intersection. During the August 1999 site visit the observed surface debris included remnants of a rock foundation, rusty cans, old stoves, wood, wire, broken glass, and equipment parts. The debris is scattered over a 150 ft by 150 ft area. The GPS coordinates of the site are N822235.76 by E341454.11. The reference number for this site is 024 and can be found on the summary map as provided.

### Part B – To Be Completed By Contractor WAG Manager

4. Recommendation:

☒ This site meets the requirements for an inactive waste site, requires investigation, and should be included in the INEEL FFA/CO Action Plan. Proposed Operable Unit assignment is recommended to be included in the FFA/CO.  
WAG: \_\_\_\_\_ Operable Unit: \_\_\_\_\_

☐ This site DOES NOT meet the requirements for an inactive waste site, DOES NOT require investigation and SHOULD NOT be included in the INEEL FFA/CO Action Plan.

5. Basis for the recommendation:

The conditions that exist at this site indicate the potential for an inactive waste site according to Section 2 of MCP-3448 Reporting or Disturbance of Suspected Inactive Waste Sites.

The basis for recommendation must include: (1) source description; (2) exposure pathways; (3) potential contaminants of concern; and (4) descriptions of interfaces with other programs, as applicable (e.g., D&D, Facility Operations, etc.)

6. Contractor WAG Manager Certification: I have examined the proposed site and the information submitted in this document and believe the information to be true, accurate, and complete. My recommendation is indicated in Section 4 above.

Name: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_